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Please reply to New Jersey

June 3, 2024

**VIA PACER**

Honorable Magistrate Singh, U.S.M.J.  
 Clarkson S. Fisher Fed. Bldg. 402 East State Street  
 Trenton, NJ 08608

**RE: KOHRI, KATHLEEN VS. WALL TOWNSHIP**

Our File No. : 92912 ELH

Docket No. : 3:22-CV-05954-MAS-RLS

Dear Magistrate Singh:

This firm represents Defendant Wall Township in this litigation. Pursuant to the Court's May 16, 2024 Court Order (Doc. 56), the parties are submitting this joint status letter as to discovery. The parties exchanged some additional paper discovery. To date, Plaintiff's deposition has been taken. The parties have conferred and are scheduling all defendant depositions, which will take place in July and August 2024. The parties reserve their rights to subpoena additional witnesses for deposition and reserve their rights to name experts. The parties have communicated via email on this date as to a discovery schedule, and request that the following discovery deadlines be ordered by the Court:

2025 Lincoln Highway • Suite 200 • P.O. Box 3012 • Edison, NJ 08818 • (732) 248-4200 • FAX (732) 248-2355  
 112 West 34<sup>th</sup> Street • 17<sup>th</sup> Floor • New York, NY 10120 • (212) 947-1999 • FAX (212) 947-3332  
 One Liberty Place • 1650 Market St., 36<sup>th</sup> Floor • Philadelphia, PA 19103 • (215) 665-5622 • FAX (215) 665-5623  
 101 Federal Street • Suite 1900 • Boston, MA 02110 • (617) 204-5630 • FAX (617) 977-9398  
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Fact discovery shall be completed by no later than October 31, 2024.

• Affirmative experts to be named no later than October 1, 2024.

• Fact witness depositions to be concluded by October 31, 2024.

• Affirmative expert reports no later than December 31, 2024.

• Responsive expert reports no later than February 28, 2025.

• Expert depositions to be completed by April 15, 2025.

• ~~Motions for summary judgment to be filed by June 15.~~

• ~~Responses to motions to summary judgement to be filed in accordance with the Federal Rules.~~

The Court will set a schedule for dispositive motions at a later date.

Please let us know if you have any questions, or wish to discuss this matter. We

thank Your Honor in advance for your consideration of this request.

Respectfully submitted,

**METHFESSEL & WERBEL, ESQS.**



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Ext. 145

ELH:ogr

The above schedule is hereby APPROVED. The parties shall file a joint status letter by no later than August 30, 2024.

So Ordered this 4th day  
of June, 2024

  
Hon. Rukhsanah L. Singh, U.S.M.J.